



November 10, 2025

Clerks' Office
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Comments on Proposed Amendments to the Landfill Methane Regulation – Staffing and Implementation Resources Impacts

The San Joaquin Valley Air Pollution Control District (District) appreciates the opportunity to comment on the California Air Resources Board's (CARB) proposed amendments to the Landfill Methane Regulation (LMR), released September 23, 2025. The District shares CARB's commitment to reducing harmful emissions in Valley communities, and like many air districts throughout California, directly enforces the LMR through a Memorandum of Understanding (MOU) with CARB. In the spirit of interagency collaboration, it is important to share our concerns regarding the limited engagement opportunities in developing the proposed amendments, and how they will substantially expand both the scope and intensity of local enforcement responsibilities without funding to support the expanded tasks associated with the proposed amendments. If the LMR continues to be implemented locally through CARB/air district MOUs, the proposal would impose significant unfunded staffing and administrative requirements on air districts that oversee a large number of regulated landfills across diverse geographic conditions.

The District's initial review of the proposed amendments identifies several key areas that will increase regulatory workload and inspection time well beyond the current LMR framework. For illustrative purposes, the following identifies a few examples of resource impacts to air districts potentially responsible for enforcement of LMR under MOUs:

1. Expanded Wellhead Monitoring and Data Analysis (\$95469(e))

The new requirements add continuous or weekly checks for pressure, temperature, oxygen, methane, CO₂, carbon monoxide, and liquid levels. Each of these parameters carries its own follow-up and corrective-action timeline.

Enforcement Impact: Review of multi-parameter datasets, trend analyses (temperature ± 20 °F and O₂ $\pm 2\%$), and verification of

corrective actions will significantly increase the time required per inspection. The District estimates at least a two- to threefold increase in data review and reporting verification per site.

2. Satellite and Remote Plume Response (§95469(b))

The new section requires landfill operators to inspect and report on CARB-identified methane plumes within five days. While the District supports the integration of remote-sensing tools, these notifications will also trigger District oversight to verify operator responses, documentation, and follow-up actions.

Enforcement Impact: Each notification will generate multiple staff hours for tracking, correspondence, and verification.

3. Enhanced Surface Monitoring and Working-Face Inclusion (§95465–95471)

By removing the working-face exclusion and establishing escalation to monthly SEM for recurring exceedances, the regulation increases both the monitored surface area and the frequency of required inspections.

Enforcement Impact: Staff will need to review more detailed surface monitoring data, validate escalation logic, and confirm ALD (Advanced Leak Detection) equivalency approvals—all requiring specialized training and more field time.

4. Expanded Reporting and Recordkeeping (§95470)

The proposed electronic reporting and new data fields (e.g., coordinate precision, one-hertz data, ALD/satellite records) will require additional time to validate and archive. Without standardized reporting software, District staff will need to manually review large data sets.

5. Semi-Continuous Operation and Permanent Shutdown Provisions (§95467)

The new multi-year demonstration and simulated-shutdown requirements will require long-term tracking and periodic verification, further adding to administrative workload.

The Initial Statement of Reasons (ISOR) estimates statewide air district costs of approximately \$139,198 per year and only \$417,594 over three years, with no identified funding source to offset those costs. This estimate significantly understates the projected resource needs for air districts like ours. Based on the proposed requirements, as described above, the District anticipates a substantial



increase in enforcement labor hours that cannot be absorbed within existing inspection and engineering resources.

To ensure effective, ongoing collaboration between CARB and air districts through a successful and equitable implementation process, the District respectfully requests that CARB work with air districts to reassess cost estimates in the ISOR to reflect realistic staff-hour demands and travel requirements; and commit to sufficient, ongoing implementation funding for local air districts. Additionally, the District would like to continue building on our strong working relationship with CARB by recommending that an implementation workgroup be established to develop the guidance and training resources necessary for successful implementation of the LMR. In summary, the District urges CARB to work collaboratively with air districts as necessary to ensure that the regulation can be implemented effectively and equitably across California.

Thank you for your consideration of these comments. The District looks forward to working with CARB staff to address these implementation challenges.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jason Lawler".

Jason Lawler
Director of Compliance
San Joaquin Valley Air Pollution Control District